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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re TRANS UNION CORP.  
PRIVACY LITIGATION

THIS DOCUMENT RELATES TO:

*All Actions*

Lead Case No. 00 cv 4729  
MDL Docket No. 1350  
Judge Robert W. Gettleman

**AGREED ORDER SUPPLEMENTING PROTECTIVE ORDER**

This matter having come before the Court on Defendant Trans Union LLC's "Agreed Motion to Supplement Protective Order," IT IS HEREBY ORDERED:

1) That the definition of "Designated Plaintiffs' Counsel" contained in Paragraph 1 of the "Protective Order Regarding Trans Union Financial Information" entered in this action on October 3, 2001 and amended on February 17, 2006, ("Protective Order"), is supplemented to include the attorneys Michael A. Caddell, Cory S. Fein, Mitchell A. Toups, Steven C. Toups, Daniel A. Edelman, and James O. Lattner, and that these attorneys are bound by the terms of the Protective Order.

2) Paragraphs 3 and 5 of the Protective Order are amended to read as follows:

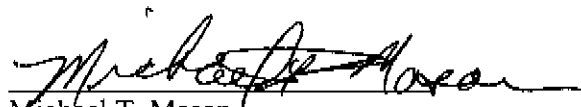
3) Trans Union Financial Information may be disclosed to Designated Plaintiffs' Counsel's employed attorneys, secretaries, paralegals, and legal assistants only as is necessary to prepare documents for filing in this action and otherwise in accordance with this protective order. Trans Union Financial Information may, subject to the terms of this Protective Order, be disclosed to experts retained by Designated Plaintiffs' Counsel who are assisting Designated Plaintiffs' Counsel with this litigation and who agree to be bound by the terms of this Protective Order ("Retained Experts"). Trans Union Financial Information may be disclosed to a deponent in this action who is not a Retained Expert only if: 1) the deponent is an employee of Trans Union and 2) the deponent has access to Trans Union Financial Information as part of his or her regular duties as an

employee of Trans Union. Any deposition testimony disclosing or discussing Trans Union Financial Information shall be separately sealed and bound by the court reporter.

- 5) All Trans Union Financial Information produced pursuant to this Order shall be maintained in the custody of Designated Plaintiffs' Counsel or Retained Experts. Within 60 days after the entry of final judgment, the entry of a dismissal order (or orders) implementing a settlement (or settlements) by all parties completely resolving this matter or the entry of a final judgment and one or more dismissal orders effectuating settlements, which, in combination, resolve all claims made by any party against any other party in this litigation, including appeals or petitions for review, then the original and all copies of documents containing Trans Union Financial Information shall be returned to Trans Union and all summaries, digests, and synopses of such information shall be destroyed. All attorney notes of Designated Plaintiffs' Counsel containing Trans Union Financial Information will be rendered completely undecipherable if copies of any such notes are retained by Designated Plaintiffs' Counsel. Notice of any and all of the aforementioned forms or treatment of handling of Trans Union Financial Information shall be given to counsel for all parties (on request) promptly thereafter. The parties may agree to implement these document returns or destruction procedures at any earlier point in this proceeding.

Entered:

Nov. 21, 2006



Michael T. Mason  
United States Magistrate Judge